

ARGUMENTS/REMARKS

Applicants would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and amended as necessary to more clearly and particularly describe and claim the subject matter which applicants regard as the invention.

Claims 1-5, 7-28, and 30-50 and 52-60 remain in this application. Claims 6, 29, and 51 have been canceled. New claims 61-64 have been added without adding any new matter.

Claims 1-5, 7-12, 15, 18-39, 42-50, 52, and 53-59 are rejected under 35 U.S.C. 103(a) as being unpatentable over by Saylor *et al.* (US 6,792,086) in view of Kuhn *et al.* (U.S. 6,341,264). Claims 13-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Saylor and Kuhn in view of Beyda *et al.* (U.S. 6,487,277). Claims 16-17, 40-41, and 51(40-41) were rejected under 35 U.S.C. §103(a) as being unpatentable over Saylor and Kuhn in further view of Woods *et al.* (U.S. 6,510,417). For the following reasons, the rejections are respectfully traversed.

The Examiner admits that Saylor fails to disclose “means for storing a plurality of user-specific speech models adapted to specific users for use by the common speech recognition module” as specified by claims 1, 52, 53, and new claim 64. Accordingly, the Examiner cites Kuhn for such a teaching.

However, the claims also require that “a plurality of interactive voice response applications providing interactive voice response functionality” be stored, and that the user-specific speech models must interact with the interactive voice response applications, thus requiring that the speech models are shared among a plurality of applications. Instead, Kuhn merely describes a single speech recognizer using the speech models. There is no suggestion to share the models with a plurality of applications found in either reference, and thus the combination fails to teach such a feature.

Furthermore, the combination of Saylor with Kuhn to obtain the claimed features would not have been obvious to one skilled in the art. Replacing each voice-to-text system 62 in the plurality of Vpage servers 22 of Saylor by the speaker-dependent systems of Kuhn would require that those Vpage servers 22 be able to identify the speaker and retrieve the appropriate speech models. This would be extremely difficult to achieve in the Saylor system, because speaker

identification is not performed in the Vpage servers 22, but in the VNAP 12 (i.e., in a different server). Neither reference suggests any means for transmitting speaker identities from the VNAP 12 to the Vpage servers 22. Such a modification would clearly change the principle of operation of the Saylor system (in a manner not disclosed by Kuhn), and thus the required modification is both not obvious, and not disclosed by the prior art, and thus is prohibited.

Furthermore, Saylor teaches away from the combination, because Saylor teaches the use of a plurality of Vpage servers, each having its own voice-to-text system 62, whereas Kuhn describes speech models used by a single application. Even if combined, this fails to teach the claimed common speech recognition model interacting with a *plurality* of applications. None of the other cited references overcome these shortcomings.

Accordingly, for any of these reasons, claims 1, 52, 53, and 64 are patentable over the references, as well as the claims dependent thereon.

Similar arguments can be applied to the user-specific speech and language models of claim 61, and thus that claim is also patentable over the references.

Claims 30, 50, and 62-63 all recite methods using a plurality of user-specific speech models adapted to specific users for use by a common speech recognition module where interactive voice response applications interact with the user-specific speech models, and thus they are patentable over the references for similar reasons to those discussed for claims 1, 52, 53, and 64.

Finally, new claims 61 and 62 recite that the user-specific models are speech *and* language models, a feature not disclosed in any of the cited references, and thus are patentable for this reason as well. New claim 64 recites that “said common speech recognition module, said user-specific speech models, and said plurality of interactive voice response applications are all hosted in a single host”, which is not disclosed in any of the references, and thus this claim is patentable over the references for this reason as well.

In consideration of the foregoing analysis, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, then a personal interview between the Examiner and the undersigned attorney is requested to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. P&TS-33226.

Respectfully submitted,
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